

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

Cameron D. Newton

Defendant

Case No. 2:23-mj-315

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 05/18/2023 in the county of Delaware in the Southern District of
Ohio, the defendant violated 18 U. S. C. § 1704 and 1708, an offense described as follows:

Count 1: 18 U.S.C. § 1704 Theft/Unlawful Possession of a Postal Key

Count 2: 18 U.S.C. § 1708 Mail Theft

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

Tyler Schwab

Complainant's signature

Tyler Schwab, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/18/2023

City and state: Columbus, Ohio

Elizabeth Preston Deavers

Judge's signature

Elizabeth Preston Deavers, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CAMERON D. NEWTON,

Defendant.

CASE NO.

2:23-mj-315

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Tyler Schwab, Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, depose and state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a complaint against Cameron D. Newton for violations of 18 U.S.C. §§ 1704 (Theft/Unlawful Possession of a Postal Key) and 1708 (Mail Theft).

2. I am a Special Agent with the FBI and have been so employed since January 2019. I have been assigned to the FBI Safe Streets Task Force in Columbus, Ohio, since January of 2023. Prior to being assigned to the Safe Streets Task Force, I was assigned to the Joint Terrorism Task Force (JTTF) for approximately four years. During my assignment at the JTTF, I was a Case Agent and Co-Case Agent for multiple international and domestic terrorism investigations. While assigned to the JTTF, I received specialized training in international terrorism and homicide investigations. Furthermore, I have received training in computer-related crimes as well as in the criminal use of email, social media, and telephonic communications.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and does not set forth all my knowledge about this matter. The facts contained in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

II. BACKGROUND ON RECENT POSTAL ROBBERIES AND MAIL THEFT

4. Federal law prohibits people from assaulting United States Postal Service (“USPS”) letter carriers with the intent to rob them of mail matter, money, or other property that belongs to the United States and that was then in the lawful charge, control, or custody of the letter carrier. 18 U.S.C. § 2114(a). The same statute prohibits people from robbing or attempting to rob those letter carriers of mail matter, money, or other property that belongs to the United States and that was then in the lawful charge, control, or custody of the letter carrier. *Id.*

5. Federal law also prohibits people from stealing any key to any lock box, lock drawer, or other authorized receptacle for the deposit or delivery of mail matter. 18 U.S.C. § 1704. The same statute prohibits people from unlawfully possessing any such mail key with the intent to unlawfully or improperly use, sell, or otherwise dispose of the same, or to cause the same to be unlawfully used, sold, or otherwise disposed of. *Id.*

6. Finally, federal law prohibits people from stealing or attempting to steal any mail matter from or out of any mail receptacle or from any letter carrier. 18 U.S.C. § 1708. The same statute prohibits people from buying, receiving, concealing, or unlawfully possessing any mail matter that has been so stolen if the person has knowledge that the item was so stolen. *Id.*

7. The United States, including the United States Postal Inspection Service (“USPIS”) and the FBI, have been conducting a criminal investigation into violations of 18 U.S.C. §§ 2114(a), 1704, and 1708 committed in and around Central Ohio. The current investigation involves a pattern of violent, armed robberies wherein the suspect(s) hold USPS letter carriers at gunpoint and then force them to hand over their USPS “arrow keys.” USPS letter carriers carry arrow keys when they deliver the mail. These arrow keys allow letter carriers to gain entry to secured mail receptacles (“blue boxes”) and secured cluster mailboxes found at apartment and condominium complexes. As of the writing of this Affidavit, approximately twenty-five postal robberies fitting this general description have occurred between January 5, 2022, and May 11, 2023, throughout the Columbus, Ohio area.

8. Once the suspect(s) obtain the stolen arrow keys, those suspect(s) then use those keys to open secure mail receptacles and cluster boxes to steal mail matter. This process of stealing the mail is sometimes referred to as “fishing.” The stolen mail matter includes, among other valuable items, personal checks, business checks, and other negotiable financial instruments. The suspect(s) then wash these checks and/or reproduce them through fraudulent means before subsequently cashing and/or depositing them at ATMs and other locations. This process of washing and/or reproducing the checks is sometimes referred to as “cooking.”

9. Because a stolen USPS arrow key can be utilized to “fish,” “cook,” and subsequently profit from, the stolen arrow keys retain intrinsic value in and of themselves. During this investigation, I have learned that suspect(s) who rob letter carriers of their arrow keys will sometimes sell those keys to third parties or “rent” them out to third parties for a discrete period without ever fishing or cooking themselves.

10. I know based on my knowledge, training, and experience that individuals who commit assaults and/or robberies of postal employees often possess other items commonly used or acquired in connection with those assaults and/or robberies. Some of these items include, but are not limited to, firearms, firearm parts, ammunition, face masks, other disguises, stolen USPS arrow keys, and stolen mail matter. I also know that individuals who are involved further downstream from the initial assaults and/or robberies—i.e., individuals who are involved in “cooking,” often possess other items commonly used to wash and/or reproduce checks and other financial instruments, including check-washing instruments and chemicals, computers, printers, Magnetic Ink Character Recognition (“MICR”) printers, check-starter kits, and other tools of the trade. Finally, I know that individuals who are involved in cashing and/or depositing stolen, washed, or fraudulently reproduced checks and financial instruments often possess other items commonly needed to do so, including fake identification cards, bank cards, deposit slips, and the like.

11. I also know based on my knowledge, training, and experience that individuals who are involved in the criminal activity described above often store those firearms, firearm parts, ammunition, face masks, other disguises, stolen USPS arrow keys, stolen mail matter, check-washing instruments and chemicals, printers, check-starter kits, fake identification cards, bank cards, deposit slips, and the like within their homes, within their cars, and, in some instances, on their persons, so that those items are easily accessible. I also know that those items are all non-perishable goods, which can be expected to remain in the individual’s possession for extended periods of time.

III. PROBABLE CAUSE

15. On May 15, 2023, United States Magistrate Judge Elizabeth A. Preston Deavers issued a search warrant for the residence located at 6841 Willoughby Court, Westerville, Ohio, based on alleged violations of 18 U.S.C. § 2114(a) (Assault/Robbery of Postal Employees), 18 U.S.C. § 1704 (Theft/Unlawful Possession of a Postal Key), and 18 U.S.C. § 1708 (Mail Theft) that had been committed by Cameron D. Newton and other individuals both known and unknown. (*See* Warrant, ECF No. 2, Case No. 2:23-MJ-312). That warrant authorized the search 6841 Willoughby Court—which was believed to be the residence of Cameron D. Newton and his parents—for evidence of those crimes; contraband, fruits of those crimes, or other items illegally possessed; and property designed for use, intended for use, or used in committing those crimes.

16. On May 18, 2023, law enforcement agents executed that search warrant. Newton was home when agents executed the warrant. During a search of the residence, agents identified an upstairs bedroom as belonging to Newton based on the contents of that bedroom, including Newton's Ohio Driver's license and multiple photos of him inside that bedroom.

17. Agents also located a host of evidence inside Newton's bedroom related to the offenses described above, including, the following:

- a. A USPS Modified Arrow Lock Key ("MAL Key") (S/N: D899-20024) and a USPS Arrow Key (S/N: 98-27596). The MAL Key was inside a tennis shoe in the bedroom and the Arrow Key was inside a closet. Both keys have serial numbers that are tracked by the USPS. The MAL Key was found to have been reported stolen during the armed robbery of a USPS employee outside of a post office located 2873 West Broad, Columbus, Ohio, on May 11, 2023. During that robbery, the USPS employee was pistol-whipped with a handgun.

- b. A white, plastic trash bag containing more than 100 pieces of mail, addressed to numerous people at various addresses, none of whom were known occupants of the residence.
- c. Several Visa money cards in different names, none of whom were known occupants of the residence.
- d. A scanner and small printer with printed checks located next to it. Those checks were in the names of various people, none of whom were known occupants of the residence.

18. Agents located additional evidence related to the offenses described above inside another bedroom in the residence, including the following:

- a. A large box containing more than 100 checks, most of which were blank; however, some of those checks were filled out and payable to various people.
- b. A black Taurus handgun.
- c. Numerous checks stuffed inside the toilet bowl located within an attached bathroom.

19. Finally, agents located additional checks stuffed into the toilet bowl of a hallway bathroom within the residence.

20. From my training and experience, I know that people attempting to hide evidence of a crime will sometimes attempt to flush that evidence down the toilet.

21. A search of USPS databases showed no record of Cameron D. Newton ever having been a USPS Employee. Therefore, his possession of the MAL Key and the Arrow Key were not lawful.

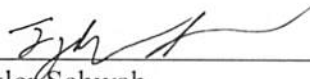
22. On August 9, 2022, Cameron D. Newton pled guilty to the following offenses in Franklin County Court of Common Pleas Case No. 22-CR-3582 and was subsequently placed on house arrest in that case pending his sentencing hearing:

- a. Count 1: Improperly Discharging a Firearm into a Habitation (F2).
- b. Count 2: Improperly Discharging a Firearm into a Habitation (F2).
- c. Count 3: Discharge of a Firearm over a Prohibited Premises (Roadway) (F3) with a one-year firearm specification.
- d. Count 4: Theft (F5).
- e. Count 5: Theft (F4).

IV. CONCLUSION

23. Based on the foregoing, I believe that there is probable cause to issue a criminal complaint and arrest warrant for Cameron D. Newton for violations of 18 U.S.C. § 1704 (Theft/Unlawful Possession of a Postal Key) and 18 U.S.C. § 1708 (Mail Theft).

Respectfully submitted,


Tyler Schwab
FBI Special Agent

Subscribed and sworn to before me on May 18, 2023


The Honorable Elizabeth A. Preston Deavers
UNITED STATES MAGISTRATE JUDGE

